

The Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

P. POE 5, and P. POEs 2 through 4 and 6 through 75, individually and on behalf of others similarly situated,

**Plaintiffs,**

V.

THE UNIVERSITY OF WASHINGTON, a Washington public corporation; PERRY TAPPER, Director of Public Records and Open Public Meetings at the University of Washington, in their official capacity,

#### Defendants.

and

PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC., a  
Virginia nonstock corporation, and  
NORTHWEST ANIMAL RIGHTS  
NETWORK, a Washington nonprofit  
corporation,

#### **Intervenor-Defendants.**

## **DECLARATION OF JANE SULLIVAN**

I, Jane Sullivan, declare as follows:

1. I am the Chair of the Institutional Animal Care and Use Committee at the University of Washington. I make this declaration based on my personal knowledge.

DECLARATION OF DR. JANE SULLIVAN  
RE: MOTION FOR PRELIMINARY INJUNCTION - 1  
P. POE 5, ET AL. v. UNIVERSITY OF WASHINGTON, ET AL.  
NO. 2:24-CV-00170-JHC

**GOLDFARB & HUCK  
ROTH RIOJAS, PLLC**  
925 Fourth Avenue, Suite 3950  
Seattle, Washington 98104  
(206) 452-0260

1       2. In my February 2024 declaration, I stated that in my capacity as Chair of the UW  
 2 IACUC, I make efforts to keep aware of instances of harassment, threats, and similar activity  
 3 directed at IACUC members and alternates, as well as at other individuals and departments that are  
 4 part of the research community at UW.

5       3. In that declaration, I also referred to incidents of harassment and public pressure  
 6 aimed at persons associated with the Washington National Primate Research Center (“WaNPRC”),  
 7 the UW-affiliated research center that has been the subject of various PETA protests.

8       4. In September of 2024, PETA itself reported that persons it described as “PETA  
 9 supporters,” quote, “interrupted the keynote speech of Elizabeth Buffalo, a troubled monkey  
 10 tormentor from the Washington National Primate Research Center, during the Simian Collective  
 11 conference held at the University Club on the University of Pittsburgh campus shouting ‘Elizabeth  
 12 Buffalo has blood on her hands! Dorothy’s blood is on her hands!’ They were tackled by police  
 13 and arrested.”

14 See:

15       << <https://www.peta.org/media/news-releases/monkey-defenders-highlight-merciless-uw-primate-experimenter-at-simian-collective-conference/> >> (as reviewed January 26, 2025,  
 16 including photos of the arrests). Attached as Exhibit A is a true and correct copy of that PETA  
 17 news release, titled “Monkey Defenders Highlight Merciless UW Primate Experimenter at Simian  
 18 Collective Conference.”

20       5. Given events like this, and the others described in previous declarations, we  
 21 continue to be concerned about possible actions by animal research opponents, including persons  
 22 who might be independently inspired by PETA’s allegations.

23       6. On Friday, December 13, 2024, I was made aware of an email that had been sent to  
 24 a UW Office of Animal Welfare email account. Attached as Exhibit B is a true and correct copy of  
 25 that email. The sender’s email address has been redacted because we are not sure if that address is  
 26 genuine.

1       7.     The email seemed to specifically reference the Ninth Circuit’s decision from a few  
 2 days before, reversing the preliminary injunction. There appeared to be little media coverage of the  
 3 Ninth Circuit decision, but PETA issued a press release about it, and PETA may have sent a similar  
 4 message to its supporters. Attached as Exhibit C is a true and correct copy of that PETA press  
 5 release, dated December 4, 2024; see: << [Ninth Circuit Victory: Court Holds Once Again that University of Washington Animal Oversight Committee Members Have No Right to Hide Names; PETA Statement | PETA](#) >> (reviewed January 26, 2025).

6  
 7       8.     Although the December 13 email to UW does not contain explicit threats, the  
 8 menacing tone and ‘canis lupus’ sign off was very frightening for me and other UW IACUC  
 9 members who were targeted in the message. Canis lupus is the scientific name for a wolf, which is  
 10 also significant for security reasons due to threats associated with “lone wolf” attackers. After  
 11 discussion with others in the UW animal care community, we decided to cancel the December  
 12 IACUC meeting, which was scheduled for Thursday Dec 19, 2024, out of concerns for the safety  
 13 of individuals who would be on site for the meeting.

14       9.     Although IACUC members can always attend our meetings remotely online via  
 15 Zoom, my understanding is that for a meeting to comply with Washington’s Open Public Meetings  
 16 Act, it must maintain a public meeting location where members of the public can view a livestream  
 17 of the meeting. During a UW IACUC meeting, an IACUC support staff person remains in the  
 18 public space during every meeting to ensure that the live stream is not lost (in which case the  
 19 meeting cannot continue until the live stream is restored). Because of our concerns about the safety  
 20 of our on-site support staff, we decided to cancel the December meeting to give us time to identify  
 21 a safe alternative.

22       10.    After consulting with the UW Police and FBI, on Jan 23, 2025, we held our January  
 23 IACUC meeting remotely online via Zoom and moved our public viewing location to the UW  
 24 Police Department Offices.  
 25

I declare under 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct.

Executed on: January 27, 2025

*s/ Jane Sullivan*

Dr. Jane Sullivan

DECLARATION OF DR. JANE SULLIVAN  
RE: MOTION FOR PRELIMINARY INJUNCTION - 4  
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# EXHIBIT A



ANIMALS ARE  
NOT OURS

to experiment on, eat, wear,  
use for entertainment, or  
abuse in any other way.

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# Monkey Defenders Highlight Merciless UW Primate Experimenter at Simian Collective Conference

**For Immediate Release:**

September 5, 2024

**Contact:**

Tasgola Bruner 202-483-7382

**Pittsburgh** – PETA supporters this morning interrupted the keynote speech of [Elizabeth Buffalo](#), a troubled monkey tormentor from the Washington National Primate Research Center, during the Simian Collective conference held at the University Club on the University of Pittsburgh campus shouting “Elizabeth Buffalo has blood on her hands! Dorothy’s blood is on her hands!” They were tackled by police and arrested.

The event promotes experiments on monkeys, and PETA supporters urged Buffalo to end her cruel and deadly experiments on primates and instead use superior, animal-free research methods that actually produce human-relevant results. Photos and video footage are [available here](#).



Buffalo is best known for her treatment of a monkey named [Dorothy](#), an elderly rhesus macaque who was confined alone to a cage and subjected to unrelenting experiments for the final two and a half years of her life. Buffalo kept Dorothy restrained and hungry, drilled a hole in her skull, and surgically implanted a titanium post. Despite Dorothy's ongoing weight loss and obvious physical deterioration, Buffalo kept experimenting on her, supposedly to learn about the neurobiology of human aging. But all that Buffalo achieved was the merciless decline of a lonely, sick, and cancer-ridden monkey.

"It's Buffalo who needs to examine her morals, not monkeys," says PETA primate scientist Dr. Lisa Jones-Engel. "PETA calls on Buffalo and her peers to stop harming primates and conduct human-relevant research."

For more than six decades, the primate center has infected, tormented, and killed monkeys; wasted taxpayer dollars; repeatedly violated the federal Animal Welfare Act; and failed the scientific community. The thousands of primate deaths include those of monkeys who were strangled, starved, and mauled. Others choked on their own vomit, had their limbs mangled, were given the wrong drugs, or died from uncontrolled diarrheal diseases.

PETA—whose motto reads, in part, that "animals are not ours to experiment on"—points out that [Every Animal Is Someone](#) and offers free [Empathy Kits](#) for people who need a lesson in kindness. For more information, please visit [PETA.org](#) or follow the group on [X](#), [Facebook](#), or [Instagram](#).



## For Media: Contact PETA's Media Response Team.

### CONTACT

#### People for the Ethical Treatment of Animals

501 Front St., Norfolk, VA 23510 • 757-622-PETA (7382) • 757-622-0457 (fax)

PETA is a nonprofit, tax-exempt 501(c)(3) corporation (tax ID number 52-1218336). CFC #11651

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# EXHIBIT B

**From:** [REDACTED]  
**To:** [Office of Animal Welfare](#)  
**Date:** Thursday, December 12, 2024 3:23:55 AM

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Who are the University of Washington's (UW) Institutional Animal Care and Use Committees members it was disclosed in a court case for the names to be released but that information does not seem to be available please respond back with a list of names many also willing to wait out side of [REDACTED] for those who come and go out of that building walk grounded (please )  
Your own regards of compliancy in best interest- canis lupus

# EXHIBIT C



ANIMALS ARE  
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to experiment on, eat, wear,  
use for entertainment, or  
abuse in any other way.

# Ninth Circuit Victory: Court Holds Once Again that University of Washington Animal Oversight Committee Members Have No Right to Hide Names; PETA Statement

**For Immediate Release:**

December 4, 2024

**Contact:**

Tasgola Bruner 202-483-7382

**Seattle** – Please see the following statement from PETA Deputy General Counsel and Director of Litigation Asher Smith regarding the decision of the 9<sup>th</sup> Circuit Court, released today, holding that University of Washington (UW) animal experimentation oversight committee members have no constitutional right to keep their identities secret. A panel of three 9<sup>th</sup> Circuit judges took less than two weeks after oral argument to issue a landmark decision in favor of appellants PETA and the Northwest Animal Rights Network (NARN), reversing a preliminary injunction granted by a Seattle-based United States District Court. This is the third time in three years that a district court decision enjoining UW from disclosing information in response to public records requests that would have identified members of the UW Institutional Animal Care and Use Committee (IACUC) has been reversed:

“

This is a major victory for transparency and a blow to all institutions that take taxpayer money for experiments on animals but try to shirk their accountability to taxpayers. Who sits on these committees in publicly funded laboratories and what they do is everyone's business, and these individuals cannot simply choose to operate in secrecy. As PETA

explained to the 9<sup>th</sup> Circuit, access to IACUC member identities is vital in allowing the public to investigate serious concerns about potentially illegal conflicts of interest: If the oversight body is improperly constituted, it is operating illegally and should have no authority to approve animal experiments.

PETA and NARN were supported at the Ninth Circuit for the third time by the Reporters Committee for Freedom of the Press, which submitted an amicus brief on behalf of 12 media organizations, including the *Seattle Times*.

The case is now remanded back to the District Court, where PETA will continue to oppose any further efforts by UW IACUC members to use the legal process to evade basic public oversight of their work as members of a governing body of an important state agency. PETA was represented by Peter Hawkes at Angeli Law Group LLC.

For more information on PETA's investigative newsgathering and reporting, please visit [PETA.org](https://PETA.org) or follow PETA on [Twitter](#), [Facebook](#), or [Instagram](#).



## For Media: Contact PETA's Media Response Team.

[CONTACT](#)

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